

## **EXHIBIT 2**

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3 CHARLESTON DIVISION  
4  
5 IN RE: ETHICON, INC., Master File No. 2:12-MD-02327  
6 PELVIC REPAIR SYSTEM MDL 2327  
7 PRODUCTS LIABILITY  
8 LITIGATION  
9 THIS DOCUMENT RELATES TO JOSEPH R. GOODWIN  
10 ALL CASES U.S. DISTRICT JUDGE  
11  
12

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

10 June 19, 2015  
11 - - -  
12 Videotaped deposition of LAURA ANGELINI,  
13 held at Rogers Towers, 1301 Riverplace Boulevard, Suite  
14 1500, Jacksonville, Florida 32207, commencing at 8:14 a.m.,  
15 on the above date before Celeste O. Werkheiser, RMR, CRR.  
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1       surgeons that any of your mesh products had a short-term  
2       foreign body reaction, and it ended and was not ongoing  
3       and chronic if, in fact, the foreign body reaction would  
4       continue. You couldn't want to misstate the truth,  
5       right?

6                    MR. GAGE: Objection.

7                    THE WITNESS: I'm not sure that I understand  
8                    your question, sir. Sorry. Can you rephrase your  
9                    question?

10          BY MR. SLATER:

11          Q        No, it doesn't matter.

12                  All right. Let's go to the next document,  
13                  which is -- November 20, 1998 is the first e-mail.

14                  MR. FAES: Handing the witness what's been  
15                  marked as Exhibit T-3731, which starts with  
16                  ETH.MESH.12009066.

17                  (Exhibit T-3731 marked.)

18          BY MR. SLATER:

19          Q        Looking at this exhibit, 3731, let's go to the  
20                  bottom of the first page. It's an e-mail regarding the  
21                  Medscand contract, and it's dated November of 1998. Do  
22                  you see that?

23          A        Yes.

24          Q        And if we go up above, we see that this chain  
25                  of e-mails, you actually wrote the e-mail in the middle

1 of the first page, and you were one of the recipients of  
2 the one at the top. So you received these e-mails,  
3 correct?

4 A Yes. Correct.

5 Q And e-mails like this, that's something that  
6 was exchanged in the ordinary day-to-day business when  
7 you were working here at Ethicon, correct?

8 A Can I read it to be able to answer your  
9 question? Give me a minute.

10 Yeah, well, I wouldn't qualify as a regular  
11 because this refers in particular to a very specific  
12 transaction between Ethicon and Medscand was the -- at  
13 that time, the owner of the TVT technology.

14 So I wouldn't qualify this as a normal e-mail  
15 in a normal day of life because it refers to a -- you  
16 know, a very particular event, which is the acquisition  
17 or the licensing of a new technology.

18 Q Ms. Angelini, you see these e-mails in front of  
19 you?

20 A Yes.

21 Q Your company, in its ordinary business, when  
22 you would communicate with other people you would use  
23 e-mails like these, correct?

24 A Oh, yes.

25 Q And that's what these e-mails are, is you and

1 other people in your company communicating within the  
2 company about company business, correct?

3 A Correct.

4 Q And if we go to the second page, which is part  
5 of the e-mail from Mark Dumenil, he talks at the very  
6 bottom about purchasing the manufacturing rights of TVT  
7 from Medscand for 22 million dollars. That's what's  
8 documented there, correct?

9 A Correct.

10 Q If we flip to the first page, at the very top  
11 there's an e-mail from Rodrigo Bianchi, and you're one  
12 of the people who got that e-mail. Do you see that?

13 A Yes.

14 Q November 20, 1998 is the date, right?

15 A Yes.

16 Q And in this e-mail, Rodrigo Bianchi -- and who  
17 is he?

18 A He was the Vice President at that time, in '98,  
19 was Vice President for Gynecare and Mitek for Europe.

20 Q And he says in this e-mail, talking about  
21 Professor Ulmsten and Medscand, that he doesn't see any  
22 reason why they should be going to Somerville -- and  
23 that would be Ethicon's offices, their U.S. headquarters  
24 in Somerville, New Jersey, right?

25 A Right.

1 Q It says: "Many times Ulmsten" -- and let me  
2 just stop there. Ulmsten is the surgeon who actually  
3 developed and created the TVT, correct?

4 A Correct.

5 Q It says: "Many times Ulmsten tried to  
6 interfere in marketing issues. We clarified that  
7 is not his job." That's what's documented here,  
8 correct?

9 A Yeah. That's what Mr. Bianchi said in this  
10 e-mail.

11 Q And he then indicates, a little further down:  
12 "TVT is a European project, and Laura is the global  
13 project leader. Let's respect roles and  
14 responsibilities."

15 He's talking about you as being the global  
16 project leader for the TVT, correct?

17 A Yes.

18 Q Global means the entire world, right?

19 A Well, in that time, that context meant my  
20 primary responsibility was, you know, the responsibility  
21 for the European business.

22 Because this product was invented in Europe and  
23 was originally manufactured by Medscand, I had  
24 additional responsibility of coordinating activities  
25 globally, which included me being in contact with my